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12 Attorneys for Defendant
TORRANCE POLICE DEPARTMENT

13 UNITED STATES DISTRICT COURT
14
15 CENTRAL DISTRICT OF CALIFORNIA

16 ROBERT THOMSON,
17 Plaintiff,

18 vs.
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20 TORRANCE POLICE DEPARTMENT
21 and THE LOS ANGELES COUNTY
22 SHERIFFS DEPARTMENT,

23 Defendants.
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Case No. CV11-06154 SJO (JCx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
30 DAYS (L.R. 8-3)**

Complaint served: August 1 and 2, 2011

Current response date: August 22 and 23,
2011

New response date: September 9, 2011

Hon. S. James Otero

1 **WHEREAS**, the current deadline for Defendant Los Angeles County
2 Sheriff's Department ("LASD") to file and serve its initial response to the First
3 Amended Complaint ("FAC") of Plaintiff Robert Thomson ("Plaintiff") is August
4 22, 2011;

5 **WHEREAS**, the current deadline for Defendant Torrance Police Department
6 ("TPD") to file and serve its initial response to the First Amended Complaint
7 ("FAC") of Plaintiff Robert Thomson ("Plaintiff") is August 23, 2011;

8 **WHEREAS**, neither the TPD nor the LASD has filed a response to the FAC,
9 as counsel for both parties requires more time to review appropriate documents, case
10 law, and potential settlement options in order to adequately respond; and

11 **WHEREAS**, Plaintiff has agreed to extend the deadline for the TPD and the
12 LASD to file and serve their initial responses or other appropriate pleadings;

13 **WHEREAS**, no prior extensions of any deadlines have been requested or
14 granted in this action, and this extension is for less than thirty (30) days; and

15 **IT IS HEREBY STIPULATED** by and between Plaintiff, TPD, and the
16 LASD, by and through their respective counsel of record, that the TPD and the
17 LASD shall have an extension of time until and including September 9, 2011, to file
18 and serve their initial responses or other appropriate pleadings to Plaintiff's FAC.

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1 This Stipulation is submitted pursuant to Local Rule 8-3, which states that
2 although the Stipulation need not be approved by the Court, it shall be filed with the
3 Court.

4 Dated: August 19, 2011

LAW OFFICE OF JONATHAN W. BIRDT

6 By: /s/ Jonathan W. Birdt

7 Jonathan W. Birdt
Attorneys for Plaintiff Robert Thomson

8 Dated: August 19, 2011

RUTAN & TUCKER, LLP
ROBERT S. BOWER
AJIT S. THIND

10 By: /s/ Robert S. Bower

11 Robert S. Bower
12 Attorneys for Defendant
TORRANCE POLICE DEPARTMENT

13 Dated: August 19, 2011

LOS ANGELES COUNTY COUNSEL
JENNIFER A. LEHMAN

15 By: /s/ Jennifer A.D. Lehman

16 Jennifer A.D. Lehman
17 Principal Deputy County Counsel
Attorneys for Defendant
18 LOS ANGELES COUNTY SHERIFF'S
DEPARTMENT